

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

DENNIS COOK

Case No. C-1-02-073

Plaintiff(s),

Judge Weber

v.

CITY OF NORWOOD, et al.,

ADDENDUM TO PRETRIAL
FILING BY AGREEMENT

Defendant(s).

ADDENDUM TO JOINT FINAL PRETRIAL ORDER

Plaintiff hereby submits the following documents as an addendum to the Joint Final Pretrial Order in the within cause of action.

/s/Robert G. Kelly

Robert G. Kelly 0002167

Attorney for Plaintiff

4353 Montgomery Road

Norwood, Ohio 45212

1-513-531-3636

1-513-531-0135 fax

No business email

CERTIFICATE OF SERVICE

I hereby certify a copy of the foregoing was sent by regular mail this 7th day of May 2004 to the following:

Lawrence E. Barbieri (0027106) -Counsel for City of Norwood
and

Michael E. Maundrell (0027110) -Counsel for City of Norwood

Schroeder, Maundrell, Barbieri & Powers

11935 Mason Road - Suite 110

Cincinnati, Ohio 45249-3703

James F. Brockman (0009469) -Counsel for Kevin Cross
Lindhorst & Dreidame
312 Walnut Street - Suite 2300
Cincinnati, Ohio 45202

W. McGregor Dixon, Jr. (0015005) -Counsel for Joseph J. Hochbein
Shipman, Dixon & Livingston
215 West Water Street
Troy, Ohio 45373

Steven C. Martin (00178571) -Counsel for Gary Hubbard
Ziegler & Schneider
541 Buttermilk Pike - Suite 500
Covington, Kentucky 41017-5710

/s/Robert G. Kelly

Robert G. Kelly

Case No. C-1-02-073

APPENDIX B

PLAINTIFF'S PROPOSED WITNESS LIST

WITNESS LIST

EXPECTED TESTIMONY

**A. DENNIS JONES
Address unknown
Phone unknown**

Employee at Norwood Public Works who worked with Plaintiff and witnessed Cook's treatment at the City of Norwood and activities of Hochbein, Hubbard, Cross and workers at Norwood Public Works. He suffered under conditions created by Defendants, including Hochbein, Hubbard, Cross and Norwood that made jobs of men with disabilities more difficult because of their disability and the harassment of workers with disabilities and any fellow workers who came to their aid. Witness to the toleration of the conditions at Public Works by Mayor Hochbein. Heard repeated racial remarks by Hubbard and name calling by the Defendants about employees with disabilities including the Plaintiff, Hubbard reading Cook's medical records on the jobsite.

**B. RAY ERWIN
2220 MADISON AVENUE
NORWOOD, OHIO 45212
351-8965**

He will testify to all allegations contained in the complaint and witnessed treatment of workers with disabilities at the City of Norwood and activities of Hubbard, Cross, Hochbein and workers at Norwood Public Works. Lent the Plaintiff money to feed his family and Hubbard's threats to fire Cook. Hubbard's repeated racial remarks at Norwood Public Works jobsites and statements to the Plaintiff with cuss words referring to the Plaintiff. That he was instructed to seal Hubbard's driveway while on city time along with Larry partied. Required to move the city grill and other equipment to Hochbein's personal residence on City time and to

Hochbein's sister's house while on city time and in a city vehicle for non City events.

**C. DENNIS COOK
4127 IVANHOE AVENUE
NORWOOD, OHIO 45212
731-9372**

I will testify to my treatment at the City of Norwood and activities of Hubbard, Cross, Hochbein and workers at Norwood Public Works. I will testify I went on food stamps, free store, church pantry and borrowed from family and friends when I was denied the right to work by Hubbard, Hochbein and Cross and how I was discriminated against as detailed in the complaint because of my disability.

**E. GARY HUBBARD
Last known address
SHERMAN AVENUE
NORWOOD, OHIO 45212
Phone unknown**

Hubbard will be called as on cross examination to testify concerning allegations contained in the complaint and his administration of Norwood Public Works. Drinking of moonshine on the job and providing it to other employees while on the job.

**F. TIMOTHY MOLONY
NORWOOD TREASURER
4645 MONTGOMERY ROAD
NORWOOD, OHIO 45212
456-8151**

Will authenticate public records of the City of Norwood AND BENEFITS OF PLAINTIFF AND PUBLIC WORKS EMPLOYEES.

**G. LEO OSTERDAY
NORWOOD PUBLIC WORKS
3001 HARRIS AVENUE
Norwood, Ohio 45212
458-4615**

Norwood Public Works employee who will testify concerning his conversations with Cross and Hubbard and instructions received from them concerning the treatment of Cook and other employees of Norwood Public Works with disabilities. Will testify to toleration of name calling of Public Works employees, singling out of Cook by Hubbard for additional and harder jobs and Hubbard's use of him to harass the Plaintiff at Hubbard's direction. Will testify to Hubbard's direction to get Cook to quit or give him a heart attack by overworking Cook. Will also testify to Hubbard and Cross disabling the street

sweeper.

**H. JEFF SMITH
NORWOOD PUBLIC WORKS
3001 HARRIS AVENUE
NORWOOD, OHIO 45212
458-4615**

Norwood Public Works employee who will testify to his employment with the City of Norwood and his promotions and disciplinary actions in the City of Norwood, name calling at Norwood Public Works and the treatment of men with disabilities as compared to other workers.

**I. KEVIN CROSS
Norwood Public Works
3001 HARRIS AVENUE
NORWOOD, OHIO 45212**

Defendant in the within cause of action who will testify to his supervision of Cook and employees of Norwood Public Works with disabilities and treatment of other employees.

**J. JOE LACINAK
Norwood Public Works
3001 HARRIS AVENUE
NORWOOD, OHIO 45212**

Employee of Norwood Public Works who spoke with Erwin and discussed with Erwin treatment of Cook, Jones and Perkins he was afraid of losing his house and car if he didn't follow what Hubbard and Cross instructed him to do. Lacinak will testify Hubbard and Cross were out to get the Plaintiff and disabled equipment to assist Cross and Hubbard to force Plaintiff into more strenuous jobs and the removal of Mayor Hochbein's computer from his office to Public Works after the Plaintiff requested to view the records on the computer.

**K. RANDY HARRIS
FLORAL AVENUE
NORWOOD, OHIO
731-1772**

Norwood Public Works employees who will testify he witnessed the treatment of Cook and other employees with a disabilities and he used a bottle to urinate in rather than risk taking a bathroom break. He will testify the treatment of the men with disabilities by the Defendants made him physically ill and he reported it to his physician. He will testify to the stalking of men with disabilities and insulting of men with disabilities by supervisors at Norwood Public Works.

- L. DONNA LAAKE**
Norwood Health Department
SHERMAN AVENUE
NORWOOD, OHIO
396-8120
- She will testify to CDL drug test of the of the Plaintiff
- M. JANET KENNEDY**
4645 MONTGOMERY ROAD
NORWOOD, OHIO 45212
396-8102
- Deputy Auditor of Norwood and will testify to the payment of benefits to Hubbard and records maintained by the City of Norwood. Additionally she will testify to wages paid to plaintiff and employees of Norwood Public Works, benefits and other compensation paid to employees of Norwood Public Works.
- N. PATRICIA ROARK**
901 CHERRY STREET, APT. 7
BLANCHESTER, OHIO 45107
1-937-783-9160
- She will testify to money lent to the Plaintiff as the result of the Plaintiff being denied the right to work; changes in the Plaintiff's attitude as the result of the harassment; Plaintiff's continuing complaints about his superiors at the City of Norwood, the name calling and how the mayor did nothing to stop it.
- O. JOSEPH MORDINO**
Address unknown
Phone unknown
- He will testify to his preparation of documents with the Defendants disciplining older men for filing EEOC complaints AND TO OTHER COMMUNICATIONS AMONG THE DEFENDANTS WHILE HE SERVED AS ASSISTANT LAW DIRECTOR.
- P. TIMOTHY GARRY**
Address unknown
Phone unknown
- He will testify to his knowledge of activities of Norwood Public Works and correspondence he sent concerning same which are public records AND TO OTHER COMMUNICATIONS AMONG THE DEFENDANTS WHILE HE SERVED AS LAW DIRECTOR. .
- Q. STACY WALL**
Address unknown
Phone unknown
- She will testify to her preparation of documents with the Defendants disciplining older men for filing EEOC complaints AND TO OTHER COMMUNICATIONS AMONG THE

**DEFENDANTS WHILE SHE SERVED
AS ASSISTANT LAW DIRECTOR.**

**R.. JOSEPH HOCHBEIN
4645 MONTGOMERY ROAD
NORWOOD, OHIO 45212
458-81511**

He will testify he is a “hands on mayor” and there is little that goes on in the City of Norwood without his knowledge. He will also testify he organized, approved and encouraged the discrimination against older men OR FAILED TO SUPERVISE OR TRAIN HUBBARD OR CROSS WHILE THEY WERE EMPLOYED BY THE CITY OF NORWOOD.

**S. ROGER PERKINS
1919 ELM AVENUE
NORWOOD, OHIO 45212
Phone unknown**

He will testify to Defendants attempting to get rid of men with disabilities by forcing them from their jobs, vulgar language and treatment of disabled men by the Defendants and the discrimination against them and Hubbard reading the Plaintiff’s medical records to him on the job site.

**T. PEGGY SNAPP
2319 WILLIAMS AVENUE
NORWOOD, OHIO 45212
531-4531**

She is the former Safety Service Director of the City of Norwood and she will testify to the Plaintiff’s character and his work ethic.

**U. THOMAS F. WILLIAMS
VARELMAN AVENUE
NORWOOD, OHIO 45212
Phone unknown**

Former captain of the Norwood Police Department who will testify Cook was detained by Norwood Police as the result of picking up his paycheck and the use of the Norwood Police Department personnel to repeatedly visit the Plaintiff’s residence at the request of the Defendants.

**V. DAVID FOX
657 North Wayne Avenue
Cincinnati, Ohio 45215
577-7900**

Manager at Contract Sweepers who will testify to the work habits of the Plaintiff, hours worked, duties performed and income earned. He will testify to hours and days missed due to Cook being subjected to unlawful discrimination by the Defendants.

**W. REBA NAZZARINI
Address unknown**

**SHE WILL TESTIFY SHE WAS AT
LOWER MILLCREST PARK IN THE**

Hamilton County, Ohio

CITY OF NORWOOD WHEN CROSS ACCOSTED HER IN THE PRESENCE OF PUBLIC WORKS EMPLOYEES AND LACINAK INTERVENED TO STOP CROSS FROM HARMING OR OTHERWISE HARASSING HER.

**X. RUTH CAIN
Krug Circle
Norwood, Ohio 45212**

WILL TESTIFY TO DISCUSSIONS AMONG CROSS, HOCHBEIN AND HUBBARD CONCERNING ACTIONS TAKEN AGAINST COOK WHEN SHE WAS A MEMBER OF NORWOOD CITY COUNCIL.

**Y. MELISSA ANDLER
4645 Montgomery Road
Norwood, Ohio 45212**

WILL TESTIFY CONCERNING THE DUTIES SHE PERFORMED AS THE SECRETARY FOR GARY HUBBARD INCLUDING THE TYPING OF ITEMS OF CORRESPONDENCE AND FORMS WHILE SHE WAS THE SECRETARY FOR GARY HUBBARD.

**Z. VICTOR HARRIS
street address unknown
Solon, Ohio (last known city and state of residence.**

SEE SWORN STATEMENT DISCOVERED BY THE PLAINTIFF ON APRIL 3, 2003.

Plaintiff intends to call one or more of the Defendants as if on cross examination.

PLAINTIFF'S EXHIBITS - APPENDIX E
DENNIS COOK VS. CITY OF NORWOOD, ET AL. - CASE NO. C-1-02-073

E X H I B I T			
P0001	SIGNED BY COOK MEMOS ISSUED BY CROSS		
P0002	SIGNED BY JONES MEMOS ISSUED BY CROSS		
P0003	SIGNED BY PERKINS MEMOS ISSUED BY CROSS		
P0004	CERTIFIED COPIES OF DRIVER'S LICENSES OF NORWOOD PUBLIC WORKS EMPLOYEES		
P0005	PERSONAL PROPERTY OF CITY EMPLOYEES BEING BROKEN		
P0006	NO CHANGING OF TIME SHEETS		
P0007	PROHIBITION AGAINST SHORTS		
P0008	CITY NOT RESPONSIBLE FOR PERSONAL ITEMS		
P0009	BLOODBORNE PATHOGENS TRAINING		
P0010	NOTICE OF UNFAIR LABOR PRACTICE HEARING ON JONES REINSTATEMENT		
P0011	SICK LEAVE PROCEDURE 9/3/98		
P0012	LEADMAN RESPONSIBLE FOR SAFETY EQUIPMENT NO DATE		
P0013	BAZZANO LETTER THAT HE WILL HEAR GRIEVANCES 12350,		

E X H I B I T				
	4688, 12345, 12338, 5694, 5695 AT STEP 3			
P0014	BAZZANO LETTER 8/11/98 TO ERWIN DENYING ERWIN GRIEVANCE #123381 AT 3RD STEP			
P0015	BAZZANO LETTER 8/11/98 TO PERKINS REF GRIEVANCE #12350 AND DENIAL OF SAME			
P0016	BAZZANO LETTER 8/11/98 TO JONES			
P0017	BAZZANO LETTER 8/26/98 TO PERKINS CONCERNING PRESUSPENSION HEARING			
P0018	CAMERON LETTER 4/1/98 TO COOK REF NEW HEARING DATE ON DISCIPLINE CHARGE FOR THE BANK TRIP			
P0019	COOK LETTER TO HUBBARD REF CATCH BASIN INSTAL- LATION DATED 4/8/98			
P0020	COOK LETTER TO CROSS REF HOT PATCH DATED 4/8/98			
P0021	DENIAL OF COOK WHISTLE BLOWER LAWSUIT DATED 9/2/98			
P0022	COOK LETTER 4/3/96 TO EDWARDS REF LABOR MANAGE- MENT MEETING			
P0023	COOK LETTER 12/31/95 TO EDWARDS REF VARIETY OF ISSUES INCLUDING SAFETY ISSUES			
P0024	COOK HEAVY EQUIPMENT OPERATOR 5/24/95			
P0025	ERWIN LETTER 9-12-97 TO HUBBARD REF ZIMMERMAN AND SMITH PICKING NUMBERS FOR WATER CREW			

E X H I B I T				
P0026	ERWIN LETTER 3/12/98 REF REFUSAL OF CROSS TO ACCEPT GRIEVANCE PRESENTED BY COOK ON 3/11/98			
P0027	ERWIN LETTER TO CROSS 8/19/98			
P0028	JONES LETTER 5/22/96 TO CROSS REF SUPPORT			
P0029	JONES EEOC COMPLAINT DATED 4/27/98			
P0030	JONES FAX 8/21/98 TO CROSS THAT JONES WAS NOT RESIGNING POSITION			
P0031	POSITION AND LETTER TO CROSS THAT HE WAS HOSPITALIZED DATED 8/20/98			
P0032	LETTER FROM LACINAK TO CROSS REQUESTING TO USE LUNCHROOM FOR UNION ELECTIONS DATED 8/24/98			
P0033	DENNIS COOK'S W-2 STATEMENTS			
P0034	MAXWELL LETTER 3/2/95 TO SULLIVAN REF GRIEVANCE #12712 FILED BY ERWIN AND RELEASING UNION OFFICERS FROM WORK TO ATTEND GRIEVANCE HEARING			
P0035	MAXWELL LETTER 7/27/95 REQUESTING LICENSE INFORMATION FOR UNION MEMBERS P06784; GRIEVANCE #7402 FILED 7/14/94 BY COOK CLASS ACTION POLICY GRIEVANCE CONCERNING REFUSAL TO TIMELY HEAR GRIEVANCES			
P0036	MAXWELL LETTER 8/29/95 RESPONDING TO COOK REQUEST TO HAVE COUNCILPERSON HUBBARD ATTEND LABOR MANAGEMENT MEETING			
P0037	MAXWELL LETTER 12/8/95 TO COOK ESTABLISHING CALL IN POLICY FOR OVERTIME AND THE NEED FOR BEEPER			
P0038	OSTERDAY LETTER REF COOK APRIL, 1998			

E X H I B I T				
P0039	POTTEBAUM'S LETTER TO HOCHBEIN DATED 5/20/99			
P0040	STAPLETON AGREEMENT TO RETURN TO WORK DATED 3/25/98 NOT SIGNED BEY ERWIN			
P0041	WALL LETTER DATED 4/13/99 REFERENCE EMPLOYEES NOT REQUIRED TO SIGN FOR MEMOS			
P0042	LETTER FROM VANOVER TO CROSS REF GRIEVANCE # 1085 REF MAIL PICKUP DATED 10/7/99			
P0043	WHITE LETTER OF RESIGNATION DATED 4/20/98			
P0044	SETTLEMENT AGREEMENT FOR MISUSE OF CITY EQUIPMENT ON MARCH 25, 1998			
P0045	HANDWRITTEN LETTER BY UNKNOWN SUBJECT			
P0046	HANDWRITTEN LETTERS OF UNKNOWN WRITER DATED 4/18/96			
P0047	LISTING OF PERSONNEL FOR CITY OF NORWOOD AS OF 11/14/95			
P0048	MEMO ADDRESSING VACATION AND TIME OFF BY COOK			
P0049	RESULTS OF BUMPING RIGHTS FOR PUBLIC WORKS 1/15/96 AS TO COOK			
P0050	CDL LICENSE FOR HARRIS DATED OR EXPIRES IN 1998			
P0051	CDL LICENSE FOR COOK DATED OR RECEIVED BY CITY ON 1/17/96			
P0052	CDL LICENSE FOR COOK DATED 3/31/94			
P0053	LICENSE FOR OSTERDAY DATED 2/8/97 WHICH IS A TEMPORARY PERMIT			

E X H I B I T				
P0054	LICENSE FOR ZIMMERMAN DATED 7/11/97			
P0055	TEMP. LICENSE FOR SMITH DATED 12/26/96			
P0056	LICENSE FOR REX PENNINGTON DATED 7/28/97			
P0057	LICENSE FOR DYKES DATED 10/21/96			
P0058	LICENSE FOR ZIMMERMAN ISSUED 9/25/96			
P0059	LICENSE FOR SEXTON ISSUED			
P0060	LABOR MANAGEMENT AGREEMENT FOR PERIOD 1/1/97 THRU 12/31/99			
P0061	TONY PENNINGTON'S VACATION RECORD DATED 1/6/99			
P0062	LICENSE OF OSTERDAY ISSUED 5/13/96			
P0063	CDL LICENSE OF ERWIN ISSUED 7/17/93			
P0064	LICENSE OF WHITE ISSUED DATE UNKNOWN			
P0065	LICENSE OF PERKINS ISSUED DATE UNKNOWN			
P0066	LICENSE OF LACINAK ISSUED 1/16/93			
P0067	TONY PENNINGTON'S VACATION RECORD DATED 2/19/99			
P0068	TONY PENNINGTON'S VACATION RECORDED DATED 6/22/98			
P0069	COOK, ERWIN, HARRIS, JONES, LYNN, SEXTON, SHANAHAN and WALTZ VALID CDL LICENSE			
P0070	LICENSE OF SEXTON DATED 3/4/94			
P0071	TEMPORARY LICENSE OF LARRY PARTIN ISSUED 11/13/97			

E X H I B I T				
P0072	LICENSE OF DYKES ISSUED 10/21/96			
P0073	CDL LICENSE OF DENNIS JONES ISSUED 9/5/95			
P0073	VALVE CLOSING PAPERWORK			
P0074	LETTER TO BAZZANO CONCERNING PERKINS GRIEVANCE #12350, GRIEVANCE 4688 GRIEVANCE 12356 GRIEVANCE 12338 GRIEVANCE 5694 GRIEVANCE 5695			
P0075	LABOR MANAGEMENT MEETING ON 5/3/99 REFERENCE PERSONAL PROPERTY			
P0076	LETTER 6/26/96 TO EDWARDS REF COOK GRIEVANCE #384 AND #413 (BACKHOE) DENYING SAME AND GRIEVANCE #385 REMOVING WRITTEN REPRIMAND			
P0077	EDWARDS LETTER 6/6/96 TO HUBBARD TO FOLLOW THE CONTRACT CONCERNING GRIEVANCE HEARINGS CONCERNING COOK			
P0078	EDWARDS LETTER 8/14/96 TO COOK ABOUT COOPERATION OR RISK PRIVATIZATION			
P0079	EDWARDS LETTER 6/1/98 TO HUBBARD WITHDRAWING GRIEVANCE 12332 12334 12335 12336 12337 12339;			
P0080	HOCHBEIN DECISION ON COOK GRIEVANCE #384, #413 AND #392 DATED 8/2/96 DENYING ALL			
P0081	HOCHBEIN LETTER 11/18/97 FOR POSTING OF B1 MECHANIC			
P0082	HOCHBEIN LETTER 3/12/98 TO ERWIN DENYING GRIEVANCE 12324 AT STEP THREE			
P0083	HOCHBEIN LETTER DATED TO EDWARDS REF STATEMENT OF			

E X H I B I T				
	UNDERSTANDING DATED 4/20/98			
P0084	HOCHBEIN LETTER 10/9/98 TO EDWARDS			
P0085	HOCHBEIN LETTER TO EDWARDS CONCERNING GRIEVANCE 12324 12331 12315 12322 12323 12325 12326 12327 12328 12329 12330 AND REFUSING TO HOLD HEARINGS ON 12315 12322 12323 12325 12326 12327 12328 12329 12330			
P0086	MEMO BY HUBBARD ABOUT DUMPING			
P0087	HUBBARD LETTER 12/21/95 TO PERKINS RESPONDING TO PERKINS LETTER DATED 12/18/95 CONCERNING HUBBARD			
P0088	HUBBARD LETTER 4/3/96 TO CROSS REF POSTING FOR WATER LABORER B-1			
P0089	HUBBARD LETTER 4/8/96 TO CROSS REF POSTING OF JOB FOR BACKHOE OPERATOR			
P0090	HUBBARD LETTER TO CROSS 5/13/96 REF POSTING FOR STREET SWEEPER OPERATOR, BACKUP POSITION			
P0091	CLINT ZIMMERMAN SICK LEAVE REQUEST DATED 3/5/97			
P0092	HUBBARD LETTER 6/17/96 TO CROSS REF SICK AND VACATION TIME			
P0093	HUBBARD LETTER 6/19/96 TO CROSS THAT TO TAKE A VACATION DAY REQUIRES 48 HOURS NOTICE			
P0094	HUBBARD LETTER 6/26/96 TO COOK WITH PROVISIONAL APPOINTMENTS			
P0095	HUBBARD LETTER 6/26/96 TO COOK PUTTING HIM BACK TO WORK HUBBARD			

E X H I B I T				
P0096	HUBBARD LETTER 8/8/96 TO EDWARDS REF EMPLOYEES OFF WORK COOK, GIBSON AND SHANAHAN			
P0097	HUBBARD LETTER 10/30/96 DENYING COOK GRIEVANCE 417, 418, 419 AND 420			
P0098	TARDY POLICY PER HUBBARD 6/24/97			
P0099	HUBBARD LETTER 12/18/97 TO CROSS REF MEETING WITH LEADMEN			
P0100	HUBBARD LETTER 11/19/97 TO ERWIN REF B1 MECHANIC, CHANGE STARTING HOURS, EVERYONE HIRED MUST HAVE CDL, BI-WEEKLY PAY AND CHANGE OF HOURS			
P0101	HUBBARD LETTER 11/10/97 REF ACTING LEADMAN PAY AND COPY TO CROSS			
P0102	HUBBARD LETTER 10/16/97 TO CROSS COMPLAINING ABOUT POLICE COMPLAINING ABOUT COOK			
P0103	HUBBARD LETTER 10/21/97 REF DYKES GRIEVANCE 12315 REF ROTATING JOB AND PAYING AS A CRAFTSMAN			
P0104	HUBBARD LETTER 10/21/97 REF SMITH GRIEVANCE #12316 REF B1 MECHANIC POSITION			
P0105	HUBBARD LETTER 10/21/97 TO ERWIN REF SMITH GRIEVANCE			
P0106	HUBBARD LETTER 10/31/97 TO CROSS CHANGING WORK HOURS			
P0107	HUBBARD LETTER 10/31/97 TO ERWIN REF POSTING FOR CRAFTSMAN LEADMAN			
P0108	HUBBARD LETTER 10/31/97 TO CROSS REF VACATION POSTING FOR 1998			

P0096	HUBBARD LETTER 8/8/96 TO EDWARDS REF EMPLOYEES OFF WORK COOK, GIBSON AND SHANAHAN			
P0097	HUBBARD LETTER 10/30/96 DENYING COOK GRIEVANCE 417, 418, 419 AND 420			
P0098	TARDY POLICY PER HUBBARD 6/24/97			
P0099	HUBBARD LETTER 12/18/97 TO CROSS REF MEETING WITH LEADMEN			
P0100	HUBBARD LETTER 11/19/97 TO ERWIN REF B1 MECHANIC, CHANGE STARTING HOURS, EVERYONE HIRED MUST HAVE CDL, BI-WEEKLY PAY AND CHANGE OF HOURS			
P0101	HUBBARD LETTER 11/10/97 REF ACTING LEADMAN PAY AND COPY TO CROSS			
P0102	HUBBARD LETTER 10/16/97 TO CROSS COMPLAINING ABOUT POLICE COMPLAINING ABOUT COOK			
P0103	HUBBARD LETTER 10/21/97 REF DYKES GRIEVANCE 12315 REF ROTATING JOB AND PAYING AS A CRAFTSMAN			
P0104	HUBBARD LETTER 10/21/97 REF SMITH GRIEVANCE #12316 REF B1 MECHANIC POSITION			
P0105	HUBBARD LETTER 10/21/97 TO ERWIN REF SMITH GRIEVANCE			
P0106	HUBBARD LETTER 10/31/97 TO CROSS CHANGING WORK HOURS			
P0107	HUBBARD LETTER 10/31/97 TO ERWIN REF POSTING FOR CRAFTSMAN LEADMAN			
P0108	HUBBARD LETTER 10/31/97 TO CROSS REF VACATION POSTING FOR 1998			

E X H I B I T				
P0109	HUBBARD LETTER TO CRAFTSMEN COPY TO CROSS THAT ALL LEADMEN LEAVE WITHOUT TARDY WORKERS AND CHANGE OF HOURS IF NECESSARY			
P0110	LUNCH POLICY PER HUBBARD EFF. 10/31/97			
P0111	HUBBARD BIWEEKLY PAY LETTER 11/5/97			
P0112	LUNCH POLICY PER HUBBARD EFF. 12/18/97			
P0113	HUBBARD LETTER 12/18/97 TO COOK REF CLEANING STREETS AND CONDITION OF TRUCK DISCIPLINE			
P0114	HUBBARD LETTER 12/18/97 TO ERWIN			
P0115	HUBBARD LETTER 1/5/98 DENYING GRIEVANCE #12328 AND DENYING GRIEVANCE #12327			
P0116	HUBBARD LETTER 1/6/98 LETTER TO ERWIN REF DRUG POLICY AND GRIEVANCE 13324 AND GRIEVANCE 13327			
P0117	HUBBARD LETTER 1/6/98 TO ERWIN			
P0118	HUBBARD LETTER 1/6/98 TO ERWIN			
P0119	HUBBARD LETTER 1/6/98 TO ERWIN			
P0120	HUBBARD LETTER 1/6/98 TO ERWIN			
P0121	HUBBARD LETTER TO ERWIN DATED 1/13/98 REF NO REOPENER			
P0122	HUBBARD AN CROSS NORWOOD DRUG AND ALCOHOL POLICY DATED 1/14/98			
P0123	HUBBARD LETTER 1/16/98 TO ERWIN			

E X H I B I T				
P0124	HUBBARD LETTER 1/16/98 TO CROSS CHANGING HOURS			
P0125	HUBBARD LETTER 1/16/98 TO ERWIN			
P0126	HUBBARD LETTER 1/21/98 TO CROSS REF NEW HOURS FOR PUBLIC WORKS			
P0127	HUBBARD LETTER 2/13/98 TO ERWIN			
P0128	HUBBARD LETTER 2/18/98 TO ERWIN			
P0129	COOK LETTERS ON SECURING TRUCK REQUESTED BY HUBBARD 4/9/98			
P0130	CLINT ZIMMERMAN SICK LEAVE REQUEST DATED 8/21/98			
P0131	HUBBARD TO CROSS ON CONDITION OF TRUCKS DATED 4/15/98			
P0132	HUBBARD LETTER TO CROSS NO PERSONAL USE OF CITY EQUIPMENT 4/13/98			
P0133	LETTER TO COOK AND ERWIN FROM HUBBARD DATE 4/16/98			
P0134	HUBBARD'S INITIAL RESPONSE TO COOK WORKPLACE VIOLENCE LETTER AND LACINAK, DYKES, EDWARDS AND RESPONSE DATED 4/20/98			
P0135	HUBBARD LETTER TO COOK ABOUT WORKPLACE VIOLENCE DATED 4/21/98 REF DYKES LACINAK ERWIN AND PARTIN COMMENTS AND DISCIPLINARY ACTION			
P0136	HIRING PSARA TO INSTRUCT ON OSHA PER HUBBARD 4/22/98			
P0137	HUBBARD LETTER 5/7/98 TO WIMMERS TO REINSTATE SICK AND VACATION FOR PERKINS			

E X H I B I T				
P0138	HUBBARD LETTER 5/20/98 TO CROSS REMOVING COOK FROM OPERATING SWEEPER			
P0139	HUBBARD LETTER 7/10/98 TO EDWARDS REF GRIEVANCE 4688, 912338, 12345 AND 12350			
P0140	HUBBARD LETTER 8/7/98 TO ERWIN CONCERNING GRIEVANCE #5154 AND GRIEVANCE #5155			
P0141	HUBBARD LETTER 8/11/98 TO ERWIN			
P0142	USE OF CITY EQUIPMENT FOR PERSONAL USE HUBBARD MEMO DATED 9/3/98			
P0143	HUBBARD LETTER 9/22/98			
P0144	HUBBARD LETTER 10/1/98 TO EDWARDS			
P0145	HUBBARD LETTER 10/1/98 TO EDWARDS			
P0146	HUBBARD LETTER 10/2/98 TO EDWARDS			
P0147	CLINT ZIMMERMAN VACATION LEAVE REQUEST DATED 6/15/98			
P0148	CLINT ZIMMERMAN VACATION LEAVE REQUEST DATED 9/15/97			
P0149	CLINT ZIMMERMAN VACATION LEAVE REQUEST DATED 2/10/98			
P0150	GRIEVANCE #12323 FROM HUBBARD DENIED 12/18/98 REF WHITE			
P0151	HUBBARD LETTER TO COOK DISPOSING OF GRIEVANCE 384,			

E X H I B I T				
385, 413, 13392, 399, 408, 409, 410, 411 AND 412				
P0152	HUBBARD LETTER 12/28/98 TO COOK			
P0153	HUBBARD LETTER 1/6/99 TO EDWARDS			
P0154	HUBBARD LETTER 1/6/99			
P0155	HUBBARD POSTING FOR WATER REPRESENTATIVE-LABORER-TRUCK DRIVER 6/4/99			
P0156	HUBBARD LETTER 6/4/99 TO EDWARDS ADDING DUTY TO POSTING FOR WATER REPRESENTATIVE LABOR TRUCK DRIVER OF HAND DIGGING			
P0157	HUBBARD LETTER UNDATED TO CROSS REF POSTING FOR BACKHOE OPERATOR			
P0158	MORDINO LETTER 4/14/98 TO COOK			
P0159	LACINAK VACATION RECORDS FOR 1997 WHERE HE WAS IN THE NEGATIVE			
P0160	LYNN VACATION RECORD FOR 1997			
P0161	PARTIN SICK RECORD FOR 1997			
P0162	PENNINGTON SICK AND VACATION 1997			
P0163	PERKINS SICK AND VACATION FOR 1997			
P0164	HARRIS SICK AND VACATION FOR 1997			
P0165	SEXTON SICK AND VACATION FOR 1997			
P0166	BRATTON SICK AND VACATION FOR 1997			

E X H I B I T				
P0167	COOK SICK AND VACATION FOR 1997			
P0168	DYKES SICK AND VACATION FOR 1997			
P0169	ENDERLIN SICK AND VACATION FOR 1997			
P0170	ERWIN SICK AND VACATION FOR 1997			
P0171	VANOVER SICK AND VACATION FOR 1997			
P0172	SMITH SICK AND VACATION FOR 1997			
P0173	WALTZ SICK AND VACATION FOR 1997			
P0174	WHITE SICK AND VACATION FOR 1997			
P0175	ZIMMERMAN SICK AND VACATION FOR 1997			
P0176	GIBSON SICK AND VACATION FOR 1997			
P0177	GRIEVANCE #7420 FILED 6/2/95 BY BRATTON CONCERNING CALL OUT FOR OVERTIME			
P0178	GRIEVANCE # 7421 FILED 6/19/95 BY ERWIN CONCERNING CALL OUT FOR OVERTIME			
P0179	GRIEVANCE #13396 FILED BY WHITE 6/21/95 CONCERNING IMPROPER CALL OUT			
P0180	GRIEVANCE #7399 FILED BY COOK, JONES, PERKINS 9-29-95 CONCERNING HIRING OF SEASONAL EMPLOYEES			
P0181	GRIEVANCE # 404 FILED 10/24/95 BY DENNIS JONES CONCERNING HIM PERFORMING A-1 MECHANICS POSITION			
P0182	GRIEVANCE # 407 FILED BY STAPLETON 1/24/96 CONCERNING DENIAL OF SENIORITY RIGHTS AFTER REINSTATEMENT AND			

EXHIBIT				
ALL RIGHTS RESTORED				
P0183	GRIEVANCE #410 FILED BY COOK AND PERKINS 4/8/96 CONCERNING THE ISSUANCE OF MEMOS WITHOUT MGT SIGNATURES AND HEARD BY CROSS			
P0184	GRIEVANCE #408 OR 468 FILED BY COOK AND PERKINS 4/8/96 CONCERNING THE CITY'S REFUSAL TO HONOR PAST PRACTICES AND IT WAS HEARD BY CROSS			
P0185	GRIEVANCE #412 FILED BY COOK DATED 4/8/96 CONCERNING HARASSMENT HEARD BY CROSS AND DENIED			
P0186	GRIEVANCE #411 FILED BY COOK 4/8/96 CONCERNING APPOINTING A LESS SENIOR MAN TO HIS POSITION AND IT WAS HEARD BY CROSS			
P0187	GRIEVANCE #399 OR 309 FILED BY COOK 4/19/96 CONCERNING RADIO HARASSMENT GETTING HOT MIX			
P0188	GRIEVANCE #413 FILED BY COOK ON 4/22/96 CONCERNING DENIAL OF RIGHT TO BUMP HEAVY EQUIPMENT POSITION			
P0189	GRIEVANCE #13392 FILED BY COOK 4/22/96 CONCERNING FAILURE TO POST BACKHOE POSITION PROPERLY 13392;			
P0190	GRIEVANCE #417 FILED BY COOK 9/11/96 CONCERNING DENIAL OF PAYMENT TO OVERTIME TO COOK AS HEAVY EQUIPMENT OPERATOR			
P0191	GRIEVANCE #418 FILED BY COOK CONCERNING DENIAL OF OVERTIME TO COOK AND AWARDED TO NONUNION EMPLOYEE			
P0192	GRIEVANCE #419 FILED BY COOK 9/13/96 CONCERNING EQUALIZATION OF OVERTIME			

E X H I B I T				
P0193	GRIEVANCE #420 FILED BY COOK 9/13/96 CONCERNING DENIAL OF PAGER TO COOK			
P0194	GRIEVANCE #409 OR 469 FILED BY COOK AND PERKINS 4/8/96 CONCERNING REQUIREMENT TO CALL A BOSS THAT YOU WERE SICK INSTEAD OF A COWORKER AND HEARD BY CROSS			
P0195	GRIEVANCE #384 FILED BY COOK 4/16/96 CONCERNING IMPROPER POSTING OF BACKHOE POSITION			
P0196	GRIEVANCE #385 FILED BY COOK 4/16/96 CONCERNING APPEAL OF WRITTEN REPRIMAND			
P0197	GRIEVANCE #12329 DATED 1/13/98			
P0198	GRIEVANCE #12333 DATED 3/2/98			
P0199	GRIEVANCE #12334 FILED 3/11/98			
P0200	GRIEVANCE #12332 DATED 3/16/98			
P0201	GRIEVANCE #12335 DATED 3/16/98			
P0202	GRIEVANCE # 12336 FILED 3/23/98			
P0203	GRIEVANCE # 12339 FILED 3/24/98			
P0204	GRIEVANCE #12338 DATED 3/24/98 FILED			
P0205	GRIEVANCE #12341 FILED 4/17/98 BY COOK CONCERNING FAILURE TO PAY COOK FOR WORKING PAST 8 HOURS			
P0206	GRIEVANCE #12343 FILED 4/17/98 BY ERWIN CONCERNING DENIAL OF USE OF HIM AS HEAVY EQUIPMENT OPERATOR			
P0207	GRIEVANCE #12340 FILED 4/17/98 BY COOK CONCERNING DENIAL OF LEADMAN POSITION			

E X H I B I T				
P0208	GRIEVANCE #12337 FILED 4/17/98 BY COOK CONCERNING DENIAL OF VACATION AFTER APPLICATION IN A TIMELY MANNER			
P0209	GRIEVANCE 1234 FILED 5/14/98 BY JONES OVER VACATION DISPUTE			
P0210	GRIEVANCE #12350 FILED 5-15-98 BY PERKINS			
P0211	GRIEVANCE #12356 FILED 5/15/98			
P0212	GRIEVANCE #4688 FILED 5/20/98			
P0213	GRIEVANCE #4692 FILED 7/10/98 BY PERKINS CONCERNING DENIAL OF BUMPING RIGHTS TO STAY ON PARK CREW			
P0214	GRIEVANCE #4693 FILED JULY 10, 1998 BY COOK CONCERNING DENIAL OF BUMPING RIGHTS			
P0215	GRIEVANCE #5694 FILED 7/12/98			
P0216	GRIEVANCE #5695 FILED 7/12/98 BY STAPLETON CONCERNING DISCRIMINATION AGAINST HIM			
P0217	GRIEVANCE 5149 FLED 7/22/98 BY COOK CONCERNING BEING REQUIRED TO TAKE A SECOND EXAMINATION BY MARZELLA			
P0218	GRIEVANCE 5146 FILED 7/22/98 FILED BY PERKINS CONCERNING FAILURE OF THE CITY TO PROVIDE BUMPING RIGHTS TO SENIOR MEN			
P0219	GRIEVANCE 5171 FILED 7/31/98 FILED BY PERKINS CONCERNING FAILURE OF THE CITY TO PROVIDE BUMPING RIGHTS TO SENIOR MEN BY REFUSING TO PERMIT HIM TO BUMP INTO A DEPARTMENT			

E X H I B I T				
P0220	GRIEVANCE #5194 FILED BY PERKINS DATED 7/31/98			
P0221	GRIEVANCE #5151 FILED 7/31/98 BY COOK			
P0222	GRIEVANCE #5195 FILED BY COOK DATED 8/2/98			
P0223	GRIEVANCE # 6806 FILED 8/21/98 BY JONES CONCERNING HIS RESIGNATION			
P0224	GRIEVANCE #5696 DATED 9/30/98			
P0225	GRIEVANCE #1085 FILED BY DYKES REF MAIL PICKUP 10/25/99 AND RELIEF GRANTED BY CROSS			
P0226	TIME SHEET AND TIME CARD POLICY PER CROSS NO DATE			
P0227	HANDWRITTEN NOTES OF CROSS CONCERNING NOTIFICATION TO BAZZANO PRIOR TO GRIEVANCE HEARINGS AT 3RD STEP			
P0228	LEADMAN RESPONSIBLE FOR SAFETY EQUIPMENT BY CROSS NO DATE			
P0229	CROSS POSTING FOR BACK UP BUS DRIVER 6/3/96			
P0230	CROSS LETTER 6/4/96 TO PERKINS DENYING COOK GRIEVANCE #393 AND ADDRESSING MEDICAL EXAMINATION AND EXCUSE			
P0231	CROSS POSTING FOR STREET SWEEPER OPERATOR, BACKUP POSITION 6/4/96			
P0232	CROSS POSTING FOR PARK CREW LEADMAN DATED 6/11/96			
P0233	CROSS LETTER 6/26/96 TO HUBBARD APPOINTING LYNN LEADMAN			

E X H I B I T				
P0234	CROSS POSTING FOR TRUCK DRIVERS 10/23/96			
P0235	CLINT ZIMMERMAN SICK LEAVE REQUEST DATED 6/24/98			
P0236	CROSS LETTER 9/17/96 TO PERKINS SETTING HEARING ON GRIEVANCE #418, #419 AND #420			
P0237	SICK LEAVE POLICY ON 1/10/97 PER CROSS			
P0238	CROSS LETTER 1/16/97 TO HUBBARD REF JOB ASSIGNMENTS FOR 1998			
P0239	CROSS LETTER 2/13/97 TO PERKINS REF LETTER 2/5/97 THAT THE RULES ARE IN THE CONTRACT			
P0240	CROSS LETTER TO PERKINS 8/11/97 DENYING STAPLETON GRIEVANCE #12314			
P0241	CROSS LETTER 11/6/97 TO HUBBARD REF ACTING LEADMAN PAY			
P0242	LUNCHTIME HOURS PER CROSS DATE 11/10/97			
P0243	VACATION POLICY PER CROSS TO TURN IN TWO WEEKS IN ADVANCE			
P0244	CHAIN OF COMMAND AT PUBLIC WORKS PER CROSS 2/20/97			
P0245	CROSS LETTER REF HOURS CHANGED 8/12/97 AND WORKING THROUGH LUNCH			
P0246	ACCIDENT POLICY FOR PUBLIC WORKS PER CROSS 9/26/97			
P0247	LEADMAN RESPONSIBILITY PER CROSS 10/2/97			
P0248	GRIEVANCE DECISION BY CROSS DATED 10/22/97 ON ENDERLIN #12320			

E X H I B I T				
P0249	LUNCH POLICY PER CROSS EFF 12/18/97			
P0250	CROSS LETTER 1/14/98 TO ERWIN			
P0251	CLINT ZIMMERMAN VACATION LEAVE REQUEST DATED 2/10/98 2/10/98			
P0252	CITY OF NORWOOD LEADMAN DUTIES AS SET FORTH BY			
P0253	CROSS LETTER TO ERWIN 2/24/98 POSTPONING GRIEVANCE			
P0254	CROSS LETTER 2/26/98 REF DAILY WORK LOGS			
P0255	CROSS LETTER 2/26/98 THAT ALL CREWS SHOULD NOT BE IN PUBLIC WORKS 15 MINUTES PRIOR TO QUITTING TIME			
P0256	CROSS LETTER 3/2/98 TO ERWIN REF DATE STAMPING GRIEVANCES			
P0257	CHANGE OF HOURS FROM CROSS TO PUBLIC WORKS DATED 3/9/98			
P0258	CROSS LETTER 3/17/98 DENYING GRIEVANCES #12333 AND #12334			
P0259	CROSS LETTER 4/20/98 TO COOK AND ERWIN REF GRIEVANCE #12332 REF BACKHOE OPERATOR POSITION			
P0260	LUNCH MUST BE TAKEN PER CROSS 4/22/98			
P0261	LETTER FROM CROSS TO HUBBARD ABOUT COOK BEING OUT OF STREET SWEEPER ON 4/22/98			
P0262	STATEMENT OF KEVIN CROSS DATED 5/4/98 REF JONES AGE DISCRIMINATION SUIT COOK			
P0263	CROSS LETTER 5/21/98 TO LACINAK DENYING PERKINS			

E X H I B I T				
GRIEVANCE #4688				
P0264	CROSS LETTER 5/21/98 TO LACINAK REF GRIEVANCE #12345 AND GRIEVANCE #12350 REF JONES AND PERKINS' GRIEVANCES AND ALL WERE DENIED			
P0265	CROSS LETTER 7/31/98 TO LACINAK DENYING GRIEVANCE #4692			
P0266	CROSS LETTER 7/31/98 TO LACINAK DENYING PERKINS GRIEVANCE 4692 AT FIRST STEP			
P0267	CROSS LETTER 7/31/98 TO LACINAK DENYING COOK GRIEVANCE 4693 CONCERNING BUMPING WHEN HE WENT HOME WHEN HE WAS TOLD TO RUN THE AIR HAMMER BY OSTERDAY AT HUBBARD INSISTENCE			
P0268	CROSS LETTER 8/3/98 DENYING GRIEVANCES 5151 5194 AND 5195 AT STEP 1			
P0269	CROSS LETTER 8/3/98 DENYING COOK GRIEVANCE 5149 CONCERNING REPEATED EXAMINATIONS			
P0270	CROSS LETTER 8/3/98 DENYING GRIEVANCE 5146 AND 5147 OF PERKINS BECAUSE CROSS BELIEVES THEM TO BE A DUPLICATION OF 4692			
P0271	CROSS LETTER 8/3/98 DENYING GRIEVANCE 5194			
P0272	CROSS LETTER 8/12/98 TO PERKINS			
P0273	CROSS LETTER 8/13/98 TO LACINAK REFERENCE ERWIN GRIEVANCE #6804			
P0274	ALL PUBLIC WORKS EMPLOYEES MUST TAKE LUNCH EFF. 8/13/98 PER CROSS			

E X H I B I T				
P0275	CROSS LETTER 8/13/98 DENYING JONES GRIEVANCE #5173 FOR NORWOOD DAY AND GRIEVANCE ATTACHED			
P0276	CROSS LETTER 8/14/98 TO JONES ACCEPTING HIS RESIGNATION			
P0277	CROSS LETTER 8/18/98 TO HOCHBEIN CONCERNING A HEARING ON 8/20/98 FOR COOK WITH TRANSCRIPT ATTACHED OF HEARING			
P0278	CROSS LETTER 8/19/98 TO WIMMERS			
P0279	CROSS LETTER 8/21/98 TO ERWIN THAT HE DIDN'T HAVE TO HOLD A HEARING FOR A MAN WHO QUIT CONCERNING JONES			
P0280	CROSS LETTER 8/21/98 TO HOCHBEIN			
P0281	CROSS GIVES PERMISSION TO USE CITY PROPERTY TO LACINAK DATED 8/26/98			
P0282	CROSS LETTER 9/22/98 TO GARRY			
P0283	LETTER FROM CROSS TO HOCHBEIN REQUESTING TERMINATION OF PERKINS DATED 10/22/98 AND LISTING HYDRANTS CLOSED			
P0284	CROSS LETTER 11/30/98 TO VANOVER			
P0285	CROSS LETTER TO VANOVER DENYING COOK OPERATION OF BACK-HOE DATED 12/1/98			
P0286	CROSS LETTER TO WHITE REF LEADMAN PAY FOR COOK AND WHETHER COOK IS IN THE STREET DEPT. OR IF IT IS A SEPARATE CLASSIFICATION DATED 2/16/99			
P0287	CROSS LETTER TO WHITE REF SAFETY POLICY AND PROCEDURE MANUAL AND PROBLEM FOLLOWING PROCEDURES DATED 3/25/99			

E X H I B I T				
P0288	CROSS POSTING FOR LEADMAN POSITION FOR PARKS DEPARTMENT DATED 5/17/99			
P0289	CROSS POSTING FOR BACK-UP STREET SWEEPER POSITION 8/30/99			
P0290	LETTER FROM PERKINS 12/18/95 TO MAXWELL REF COOK DRIVING BACKHOE AND HUBBARD INTERFERING WITH OPERATION OF PUBLIC WORKS AND WHO IS IN CHARGE			
P0291	PERKINS LETTER 4/18/96 TO EDWARDS TO SET GRIEVANCE HEARING			
P0292	PERKINS LETTER 9/4/96 TO CROSS REF POLICY CHANGES			
P0293	PERKINS LETTER 2/5/97 TO CROSS REF POSTING OF MEMOS			
P0294	PERKINS LETTER TO HUBBARD REF CHANGE OF HOURS DATED 7/18/97			
P0295	GOOD WORK LETTER FOR PUBLIC WORKS EMPLOYEES INCLUDING HYDRANT PROGRAM DATED 12/11/97 REF PERKINS			
P0296	PERKINS LETTER TO EDWARDS TO SET GRIEVANCE HEARING			
P0297	AUDITOR RECORDS FOR PERKINS VACATION AND SICK TIME IN MAY 1998			
P0298	TYPED JOB DESCRIPTION OF SHANAHAN UNDATED			
P0299	TYPED JOB DESCRIPTION OF JONES UNDATED			
P0300	TYPED JOB DESCRIPTION OF HARRIS UNDATED			
P0301	TYPED JOB DESCRIPTION OF LACINAK UNDATED			

E X H I B I T				
P0302	TYPED JOB DESCRIPTION OF DYKES	UNDATED		
P0303	TYPED JOB DESCRIPTION OF ENDERLIN	UNDATED		
P0304	TYPED JOB DESCRIPTION OF WALTZ	UNDATED		
P0305	TYPED JOB DESCRIPTION OF SMITH	UNDATED		
P0306	TYPED JOB DESCRIPTION OF LYNN	UNDATED		
P0307	TYPED JOB DESCRIPTION OF ZIMMERMAN	UNDATED		
P0308	TYPED JOB DESCRIPTION OF ERWIN	UNDATED		
P0309	TYPED JOB DESCRIPTION OF GIBSON	UNDATED		
P0310	TYPED JOB DESCRIPTION OF BRATTON	UNDATED		
P0311	TYPED JOB DESCRIPTION OF STAPLETON	UNDATED		
P0312	TYPED JOB DESCRIPTION OF PERKINS	UNDATED		
P0313	TYPED JOB DESCRIPTION OF WHITE	UNDATED		
P0314	TYPED JOB DESCRIPTION OF COOK	UNDATED		
P0315	TYPED JOB DESCRIPTION OF SEXTON	UNDATED		
P0316	HANDWRITTEN JOB DESCRIPTION OF SEXTON	UNDATED		
P0317	HANDWRITTEN JOB DESCRIPTION OF JONES	UNDATED		
P0318	HANDWRITTEN JOB DESCRIPTION OF HARRIS	UNDATED		
P0319	HANDWRITTEN JOB DESCRIPTION OF LACINAK	UNDATED		
P0320	HANDWRITTEN JOB DESCRIPTION OF DYKES	UNDATED		

E X H I B I T				
P0321	HANDWRITTEN JOB DESCRIPTION OF ENDERLIN	UNDATED		
P0322	HANDWRITTEN JOB DESCRIPTION OF WALTZ	UNDATED		
P0323	HANDWRITTEN JOB DESCRIPTION OF SMITH	UNDATED		
P0324	HANDWRITTEN JOB DESCRIPTION OF LYNN	UNDATED		
P0325	HANDWRITTEN JOB DESCRIPTION OF ZIMMERMAN	UNDATED		
P0326	HANDWRITTEN JOB DESCRIPTION OF ERWIN	UNDATED		
P0327	HANDWRITTEN JOB DESCRIPTION OF GIBSON	UNDATED		
P0328	HANDWRITTEN JOB DESCRIPTION OF SHANAHAN	UNDATED		
P0329	HANDWRITTEN JOB DESCRIPTION OF BRATTON	UNDATED		
P0330	HANDWRITTEN JOB DESCRIPTION OF STAPLETON	UNDATED		
P0331	HANDWRITTEN JOB DESCRIPTION OF PERKINS	UNDATED		
P0332	HANDWRITTEN JOB DESCRIPTION OF WHITE	UNDATED		
P0333	HANDWRITTEN JOB DESCRIPTION OF COOK	DATED 8/5/96		
P0334	HANDWRITTEN JOB POSTING FOR PARK LEADMAN	UNSIGNED AND UNDATED		
P0335	D. PENNINGTON CDL TEMPORARY PERMIT ISSUED	8/11/99		
P0336	LAAKE LETTER 9/29/99 TO BLUMBERG WITH REF RANDOM DRUG TESTING FOR PUBLIC WORKS			
P0337	CLINT ZIMMERMAN SICK LEAVE REQUEST DATED	11/17/98		

E X H I B I T				
P0338	THOMAS WHITE VACATION REQUEST DATED 11/2/98			
P0339	THOMAS WHITE VACATION REQUEST DATED 9/1/98			
P0340	THOMAS WHITE VACATION REQUEST DATED 12/1/97			
P0341	NORWOOD FORM CDL ALCOHOL AND DRUG TESTING SIGN-OFF CERTIFICATE FOR DWAYNE SMITH DATED 9/21/99			
P0342	CITY OF NORWOOD SEXUAL HARASSMENT POLICY			
P0343	HUBBARD LETTER TO CROSS DATED 10/4/96			
P0344	CROSS LETTER TO HOCHBEIN DATED 12/26/96			
P0345	HOCHBEIN LETTER TO MORELAND DATED 1/28/96			
P0346	HUBBARD LETTER TO CROSS DATED 3/18/97			
P0347	HUBBARD LETTER TO WALTER EDWARDS DATED 3/1/96			
P0348	HUBBARD LETTER TO CROSS DATED 3/10/97			
P0349	HUBBARD LETTER TO MORDINO DATED 10/22/97			
P0350	NORWOOD FORM CDL ALCOHOL AND DRUG TESTING SIGN-OFF CERTIFICATE FOR HUBBARD DATED 12/8/97			
P0351	CROSS LETTER TO KENNEDY DATED 12/8/98			
P0352	HUBBARD LETTER TO WIMMERS DATED 7/23/98			
P0353	COOK LETTER TO LACINAK DATED 5/17/98			
P0354	HUBBARD LETTER TO CROSS DATED 1/5/98			
P0355	CROSS LETTER TO HUBBARD DATED 8/13/98			

E X H I B I T				
P0356	NORWOOD FORM CDL ALCOHOL AND DRUG TESTING SIGN-OFF CERTIFICATE FOR COOK DATED 12/8/97			
P0357	NORWOOD FORM CDL ALCOHOL AND DRUG TESTING SIGN-OFF CERTIFICATE FOR ZIMMERMAN DATED 12/8/97			
P0358	CITY OF NORWOOD JOB SPECIFICATION FOR HEAVY EQUIPMENT OPERATOR UNDATED			
P0359	CITY OF NORWOOD JOB SPECIFICATION FOR TRUCK DRIVER UNDATED			
P0360	CITY OF NORWOOD JOB SPECIFICATION FOR BUS DRIVER UNDATED			
P0361	CITY OF NORWOOD JOB SPECIFICATION FOR LABORER UNDATED			
P0362	CITY OF NORWOOD JOB SPECIFICATION FOR LEAD MAN UNDATED			
P0363	CITY OF NORWOOD JOB SPECIFICATION FOR METER READER UNDATED			
P0364	CITY OF NORWOOD JOB SPECIFICATION FOR A-1 MECHANIC DATED 1-27-98			
P0365	D. SMITH LETTER 5/24/99 TO CROSS			
P0366	CROSS LETTER 10/20/99 TO SMITH			
P0367	CROSS LETTER 7/7/98 TO SMITH			
P0368	CROSS LETTER 6/18/98 TO SMITH			
P0369	CROSS LETTER 2/19/98 TO SMITH			

E X H I B I T				
P0370	CROSS LETTER 8/12/97 TO SMITH			
P0371	CROSS LETTER 7/29/97 TO SMITH			
P0372	CROSS LETTER 6/27/97 TO SMITH			
P0373	SMITH LETTER 10/16/98 TO WHOM IT MAY CONCERN			
P0374	SMITH REPORT CONCERNING ACCIDENT ON 10/13/98			
P0375	SMITH SICK LEAVE APPLICATION 9/20/99			
P0376	SMITH SICK LEAVE APPLICATION 10/8/99			
P0377	SMITH SICK LEAVE APPLICATION 12/10/96			
P0378	SMITH SICK LEAVE APPLICATION 11/25/96			
P0379	SMITH GROUP HEALTH ASSOCIATES WORK RESTRICTION 5/20/99			
P0380	SMITH DRIVING PRIVILEGES 11/22/97 PER BMV			
P0381	SMITH CDL LICENSE ISSUED ON 1/22/98			
P0382	SMITH EXAMINER'S DRIVING PERMIT ISSUED ON 6/26/97			
P0383	SMITH ACCIDENT REPORT FORM 10/7/98			
P0384	SMITH ACCIDENT REPORT FORM ON 10/15/98			
P0385	SMITH SICK LEAVE APPLICATION 7/16/99			
P0386	SMITH SICK LEAVE APPLICATION ON 4/21/99			
P0387	SMITH SICK LEAVE APPLICATION ON 6/21/99			

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P0388	SMITH SICK LEAVE APPLICATION ON 4/30/99			
P0389	SMITH SICK LEAVE APPLICATION 9/16/98			
P0390	SMITH APPLICATION FOR VACATION LEAVE ON 9/17/98			
P0391	SMITH APPLICATION FOR VACATION LEAVE ON 8/3/98			
P0392	SMITH SICK LEAVE APPLICATION 5/14/99			
P0393	SMITH APPLICATION FOR VACATION LEAVE ON 3/10/99			
P0394	SMITH APPLICATION FOR VACATION LEAVE ON 2/5/99			
P0395	SMITH SICK LEAVE APPLICATION 11/12/98			
P0396	SMITH SICK LEAVE APPLICATION 11/12/98			
P0397	SMITH VACATION LEAVE APPLICATION FILED 10/26/98			
P0398	SMITH SICK LEAVE APPLICATION 10/21/ 98			
P0399	SMITH GRANTED A LEAVE OF ABSENCE ON 10-2-95			
P0400	SMITH APPLICATION FOR VACATION ON 9/17/98			
P0401	SMITH APPLICATION FOR LEAVE OTHER THAN SICK OR VACATION FILED ON 9/16/98			
P0402	SMITH SICK LEAVE APPLICATION 5/14/98 FOR ½ DAY			
P0403	SMITH SICK LEAVE APPLICATION 7/21/98			
P0404	APPLICATION FOR LEAVE APPROVED BY CROSS FILED 6/29/98			
P0405	SMITH SICK LEAVE APPLICATION 5/14/98			

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P0406	SMITH SICK LEAVE APPLICATION 12/30/97			
P0407	SMITH SICK LEAVE APPLICATION 1/7/98 FOR 1/7/98			
P0408	SMITH 97 APPLICATION FOR SICK OR VACATION TIME SMITH SICK LEAVE APPLICATION 10/31/97 APPROVED BY CROSS WITH DOCTOR EXCUSE			
P0409	SMITH VACATION LEAVE APPLICATION 9/30/97			
P0410	SMITH SICK LEAVE APPLICATION 9/16/97			
P0411	SMITH APPLICATION FOR PERSONAL LEAVE ON 3/25/97			
P0412	SMITH SICK LEAVE APPLICATION 6/24/97			
P0413	SMITH SICK LEAVE APPLICATION ON 4/18/97			
P0414	SMITH ACCIDENT REPORT 8/27/97			
P0415	SMITH VACATION APPLICATION 4/15/97			
P0416	SMITH SICK LEAVE APPLICATION 8/13/97			
P0417	SMITH SICK LEAVE APPLICATION 9/24/96			
P0418	CRAFTSMAN WATER SERVICE REPRESENTATIVE JOB DESCRIPTION			
P0419	CHECKOUT LIST FOR EQUIPMENT BORROWED FROM PUBLIC WORKS			
P0420	AFFIDAVIT OF RANDY HARRIS			
P0421	LETTER 8/24/98 TO DENNIS J. COOK FROM MICHAEL REA, OBES			
P0422	ENQUIRER PHOTO OF DENNIS COOK DRIVING BACKHOE FOR			

E X H I B I T				
CITY 4/96				
P0423	LETTER 1/5/98 TO KEVIN CROSS FROM GARY HUBBARD			
P0424	LETTER 1/5/98 TO RAY ERWIN FROM HUBBARD RE GRIEVANCE 12328			
P0425	LETTER 1/6/98 TO RAY ERWIN FROM HUBBARD RE GRIEVANCE 12326			
P0426	LETTER 1/13/98 TO RAY ERWIN FROM HUBBARD, PAGE ONE			
P0427	LETTER 1/13/98 TO RAY ERWIN FROM HUBBARD, PAGE TWO			
P0428	LETTER 1/14/98 TO RAY ERWIN FROM CROSS			
P0429	DRUG & ALCOHOL POLICY, CITY OF NORWOOD CDL			
P0430	LETTER 1/16/98 TO CROSS FROM HUBBARD RE HOURS OF WORK			
P0431	LETTER 1/16/98 TO RAY ERWIN FROM HUBBARD RE GRIEVANCE 12330			
P0432	LETTER 1/16/98 TO RAY ERWIN FROM HUBBARD RE GRIEVANCE HEARING			
P0433	LETTER 1/18/98 TO COOK FROM CROSS RE CONVERSATION WITH RGK			
P0434	LETTER 1/19/98 TO PERKINS FROM HUBBARD			
P0435	LETTER 1/21/98 TO CROSS FR HUBBARD NOTICE PLEASE POST			
P0436	LETTER 1/22/98 TO CROSS FR HUBBARD RE SICK LEAVE			
P0437	LETTER 1/23/98 TO ERWIN FROM HUBBARD RE GRIEVANCE			

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12329				
P0438	LETTER 1/28/98 TO LOCAL 914 FROM HUBBARD RE WORK SCHEDULES			
P0439	LETTER 1/29/98 TO JONES FROM CROSS CHARGING ART 14 SEC 11			
P0440	LETTER 1/29/98 TO RGK FROM HUBBARD RE RAY ERWIN OFFER			
P0441	LETTER 1/29/98 TO CROSS FROM HUBBARD RE WEARING UNIFORMS			
P0442	MEMO 1/29/98 TO PUBLIC WORKS EMPLOYEES FROM CROSS			
P0443	MEMO 1/29/98 TO PW EMPLOYEES FROM CROSS RE USE OF RADIO			
P0444	MEMO TO CROSS FROM KENNEDY RE DENNIS JONES SICK LEAVE			
P0445	SPREADSHEET ATTACHED TO P0444 MEMO			
P0446	LETTER 2/13/98 HUBBARD'S FINDINGS FROM 2/12/98 GRIEV MEETING			
P0447	LETTER 2/17/98 TO PERKINS FROM CROSS ISSUING ORAL WARNING			
P0448	LEADMAN RESPONSIBILITIES			
P0449	LETTER 2/19/98 TO JEFF SMITH FROM CROSS RE ORAL WARNING			
P0450	LETTER 2/19/98 TO ERWIN FROM CROSS RE COOK'S LOG AND CREWS			

E X H I B I T				
P0451	MEMO 2/20/98 TO LEADMEN FROM CROSS RE EMERGENCY CALL-OUTS			
P0452	SIGN ADVISING LOCAL 914 OF MEETING 2/20/98 AT 11:00 A.M			
P0453	LETTER 2/24/98 TO ERWIN FROM CROSS CHARGING INSUB AND NEGLECT			
P0454	CROSS LETTER TO HUBBARD DATED 12/8/98			
P0455	POSTING OF NEW START TIMES EFFECTIVE MARCH 9, 1998			
P0456	NOTICE TO DENNIS/TONI COOK DATED 3/10/98 FROM ROHRIG			
P0457	ATTACHMENT TO P0456 NOTICE			
P0458	LETTER 3/11/98 TO PERKINS FROM CROSS RE JOBS TO GET DONE			
P0459	LETTER 3/11/98 TO COOK FROM CROSS RE WRITTEN WARNING			
P0460	LETTER 3/12/98 TO CROSS FROM HUBBARD REMOVING PERKINS			
P0461	LETTER 3/17/98 TO ERWIN FROM BAZZANO RE MARCH 9 HEARING			
P0462	LETTER 3/20/98 TO CROSS FROM HUBBARD RE VEHICLE 472			
P0463	LETTER 3/24/98 TO COOK FROM CROSS LEADMAN RESPONSIBILITIES			
P0464	LETTER 3/24/98 TO COOK FROM CROSS RE CLEANING THE SWEEPER			
P0465	LETTER 3/24/98 TO PERKINS FROM CROSS LEADMAN			

E X H I B I T				
RESPONSIBILITIES				
P0466	LETTER 3/25/98 TO COOK FROM CROSS CHARGING EQUIPMENT MISUSE			
P0467	LETTER 3/26/98 TO COOK FROM CAMERON NOTICE OF 4/1/98 HEARING			
P0468	JOB POSTING - STREET CREW LEADMAN			
P0469	LETTER 7/2/98 TO COOK FROM HUBBARD RE JACKHAMMER, SICK LEAVE			
P0470	LETTER 7/6/98 TO COOK FROM HUBBARD ORDERING PHYSICAL EXAM			
P0471	LETTER 7/7/98 TO CROSS FROM HUBBARD RE TAKING CITY PROPERTY			
P0472	CROSS LETTER TO HUBBARD DATED 8/13/98			
P0473	LETTER 7/13/98 TO COOK FROM HUBBARD ORDERING PSYCH EXAM			
P0474	LETTER 7/13/98 TO PERKINS FROM CROSS ASSIGNING TO STREET DEPT			
P0475	LETTER 7/14/98 TO COOK FROM HUBBARD RE USE OF CAR FOR APPT.			
P0476	LETTER 7/20/98 TO COOK FROM CROSS RE REFUSAL TO SIGN WAIVER			
P0477	LETTER 7/22/98 TO CROSS FROM HUBBARD RE COOK NOT DRIVING			
P0478	LETTER 7/22/98 TO COOK FROM HUBBARD RE COOK NOT			

E X H I B I T				
DRIVING				
P0479	LETTER 7/23/98 TO COOK FROM HUBBARD ORDERING PSYCH EVAL			
P0480	LETTER 7/23/98 TO COOK FROM HUBBARD ORDERING SIGNING RELEASE			
P0481	LETTER 7/28/98 TO COOK FROM HUBBARD RE WRITTEN WARNING			
P0482	APPLICATION FOR SICK OR VACATION TIME COOK 7/29/98			
P0483	LETTER 7/29/98 TO COOK FROM HUBBARD RE STATEMENTS MADE 7/29			
P0484	LETTER 7/30/98 TO COOK FROM CROSS ORAL WARNING NO MASK			
P0485	MEMO TO PWE FROM CROSS RE TAKING OFF AFTER CLOCKING IN			
P0486	LETTER 7/31/98 TO LACINAK FROM CROSS DENYING GRIEVANCE #4692			
P0487	LETTER 8/3/98 TO CROSS FROM HUBBARD RE POSTING PROPER SIGNAGE			
P0488	LETTER 8/26/98 TO PERKINS/COOK FROM CROSS SETTING 9/3 HEARING			
P0489	LETTER 8/11/98 TO PERKINS FROM BAZZANO RE GRIEVANCE 12350			
P0490	HUBBARD LETTER TO CROSS DATED 8/3/98			

E X H I B I T				
P0491	HUBBARD'S REFUSAL TO SIGN FOR GRIEVANCE 5177 ON 8/13 CALENDAR			
P0492	LETTER 8/13/98 TO LACINAK FROM CROSS RE GRIEVANCE 5173			
P0493	LETTER 8/13/98 TO HUBBARD FROM CROSS RE SERIOUS SAFETY VIOLATION.			
P0494	LETTER 8/14/98 TO COOK FROM CROSS IMPOSING ADMINISTRATIVE LEAVE			
P0495	LETTER 8/21/98 TO HOCHBEIN FROM CROSS RE PERKINS CHARGES			
P0496	LETTER 8/26/98 TO PERKINS/COOK NOTIFYING OF 9/3 HEARING			
P0497	LETTER 9/2/98 TO COOK/PERKINS RESCHEDULING HEARING TO 9/8/98			
P0498	LETTER 9/14/98 TO COOK/PERKINS RE HEARING OF 9/8/98			
P0499	LETTER 10/1/98 TO EDWARDS FROM HUBBARD RE GRIEVANCE 5171			
P01000	LETTER 10/2/98 TO EDWARDS FROM HUBBARD RE 10/1/98 LETTER			
P01001	LETTER 10/26/98 TO COOK FROM CROSS RE RETURN TO WORK			
P01002	LETTER 11/6/98 TO COOK FROM CROSS RE BATHROOM BREAKS			
P01003	LETTER 11/13/98 TO COOK FROM HUBBARD RE M.D. APPT. 11/13/98			

E X H I B I T				
P01004	LETTER 11/19/98 TO COOK FROM HUBBARD - NOW COOK CAN DRIVE			
P01005	LETTER 12/3/98 TO COOK FROM HUBBARD RE VACATION REQUEST			
P01006	LETTER 12/15/98 TO KENNEDY FROM WALL RE COOK'S VACATION			
P01007	LETTER 12/28/98 TO COOK FROM HUBBARD RE GRIEVANCE 1087			
P01008	LETTER 12/28/98 TO COOK FROM HUBBARD RE VACATION REQUESTS			
P01009	APPLICATION FORM ATTACHED TO 901031 LETTER			
P01010	APPLICATION FORM ATTACHED TO 901031 LETTER			
P01011	LETTER 1/6/99 TO EDWARDS FROM HUBBARD RE GRIEVANCE 1087			
P01012	LETTER 1/29/99 TO RGK FROM WALL RE PERKINS RETURN TO WORK			
P01013	LETTER 2/16/99 TO WHITE FROM CROSS RE LEADMAN PAY FOR COOK			
P01014	NOTE ON RIVERFRONT STEEL NOTE PAPER			
P01015	MEMO 2/25/99 TO PWE FROM CROSS RE PERSONAL PROPERTY			
P01016	MEMO 3/1/99 TO PWE FROM CROSS RE I.D. BADGES			

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P01017	MEMO 3/4/99 TO PWE FROM CROSS RE RADIO PROCEDURES			
P01018	LETTER 3/14/99 TO CROSS FROM HUBBARD - SAFETY MANUAL			
P01019	VEHICLE OPERATION PAGE (ATTACHED TO 901097)			
P01020	LETTER 4/6/99 TO COOK FROM SMITH - WRITTEN WARNING			
P01021	MEMO 4/8/99 TO PWE RE UPDATE SAFETY POLICY & PROCEDURE			
P01022	NOTICE FROM HUBBARD TO PWE TO RETURN UNIFORM SHORTS			
P01023	LETTER 6/1/99 TO RGK FROM S. WALL RE COOK WORK RESTRICTIONS			
P01024	CITY OF NORWOOD SAFETY POLICIES AND PROCEDURES FOR PUBLIC WORKS			
P01025	LETTER 4/11/97 FROM PERKINS TO JONES WHY DUTIES WEREN'T DONE			
P01026	LETTER 5/5/97 TO OSTERDAY FROM HUBBARD RE PROBATIONARY PERIOD			
P01027	LETTER 5/6/97 TO SMITH FROM HUBBARD MOVING HIM TO STEP B			
P01028	LETTER 6/26/97 TO HUBBARD FROM CROSS RE JONES'S DEPARTMENT			

E X H I B I T				
P01029	LETTER 7/30/97 TO HUBBARD FROM CROSS RE BACKHOE OPERATORS			
P01030	LETTER 8/1/97 TO COOK FROM HUBBARD RE MEDICAL EXCUSES			
P01031	LETTER 9/24/97 TO CROSS FROM HUBBARD RE DYKES ORAL WARNING			
P01032	MEMO 9/26/97 TO PWE FROM CROSS RE LEAVING SCENE OF ACCIDENT			
P01033	LETTER 10/21/97 TO ERWIN FROM HUBBARD RE WATER LABORER B1			
P01034	LETTER 10/21/97 TO ERWIN FROM HUBBARD RE GRIEVANCE #12316			
P01035	DAVENPORT RECEIPT FOR PAGER DATED 4/16/98			
P01036	CROSS LETTER TO HUBBARD DATED 6/30/98 CONCERNING DAVENPORT PROBATIONARY PERIOD			
P01037				
P01038				
P01039	LETTER 10/31/97 TO ERWIN FROM HUBBARD RE GRIEVANCES 12315/16			
P01040	LETTER 11/3/97 TO CROSS FROM HUBBARD RE CDL TEMPORARY LIC			
P01041	LETTER 11/12/97 TO CROSS FROM HUBBARD RE POSTING			

E X H I B I T				
	WATER LABORER			
P01042	LETTER 11/18/97 TO IRWIN (SIC) FROM HOCHBEIN RE GRIEV 12316			
P01043	LETTER 12/5/97 TO ERWIN FROM HUBBARD RE ONE DAY UNION LEAVE			
P01044	LETTER 12/5/97 TO ERWIN FROM HUBBARD RE SNOW OVERTIME			
P01045	LETTER 12/9/97 TO PARTIN FROM HUBBARD RE PROBATIONARY PERIOD			
P01046	LETTER 12/16/97 TO ZIMMERMAN RE WATER LABORER B1			
P01047	MEMO 12/18/97 TO LEADMEN FROM CROSS RE LUNCH TIME			
P01048				
P01049	LETTER 12/29/97 TO ERWIN FROM HUBBARD RE SUSPENSION FOR INSUB			
P01050	LETTER 1/5/98 TO CROSS FROM HUBBARD RE SWEEPER OPERATOR II			
P01051	LETTER 4/2/98 TO COOK FROM CROSS RE DIG OUT HOT PATCH			
P01052	LETTER 4/3/98 TO CROSS FROM COOK ASKING FOR COPIES			
P01053	LETTER 4/3/98 TO COOK FROM CROSS RE CONES AND BARRICADES			

E X H I B I T				
P01054	LETTER 4/3/98 TO COOK FROM CROSS SETTING HEARING 4/9/98			
P01055	LETTER 4/6/98 TO COOK FROM CROSS RE UNATTENDED TRUCK 453			
P01056	COOK'S STATEMENT IN RESPONSE TO #P636 LETTER			
P01057				
P01058	LETTER 4/7/98 TO COOK FROM CROSS RE JONES AND CONCRETE REPAIR			
P01059				
P01060	LETTER 4/13/98 TO CROSS FROM HUBBARD RE LEADMAN OF STREET DEPT			
P01061	AGREEMENT AND RELEASE ON GRIEVANCES 13392 AND 413			
P01062	GRIEVANCE # 13392			
P01063	GRIEVANCE REPORT			
P01064	ADDENDUM TO CONTRACT LOCAL 914 TOOL ALLOWANCE			
P01065	LETTER 4/13/98 TO CROSS FROM HUBBARD RE COOK, JACKHAMMER			
P01066	LETTER 4/13/98 TO CROSS FROM HUBBARD PERSONAL USE OF CITY EQUIPMENT			

E X H I B I T				
P01067	LETTER 4/17/98 TO COOK FROM HUBBARD RE COOK BEING THREATENED			
P01068	LETTER 4/20/98 TO COOK FROM HUBBARD RE FAX MACHINES			
P01069	LETTER 4/20/98 TO COOK FROM CROSS TO CALL IN LOCATIONS			
P01070	LETTER 4/21/98 TO COOK FROM HUBBARD RE FALSE STATEMENTS			
P01071	LETTER 4/24/98 TO COOK FROM WIMMERS RE VACATION AUTHORIZ.			
P01072	LETTER 4/24/98 TO COOK FROM HUBBARD RE VACATION			
P01073	APPLICATION FOR LEAVE (ATTACHED TO P723)			
P01074	LETTER 4/30/98 TO COOK RE CROSS RE ASKING LEO OSTERDAY			
P01075	BOOK OF MEMOS ISSUED AROUND MAY 1998			
P01076	LETTER 5/7/98 TO PERKINS FROM HUBBARD ACCEPTING RESIGNATION			
P01077	LETTER 5/7/98 TO PERKINS RE HUBBARD CANCELING HEARING OF 5/12			
P01078	LETTER 5/7/98 TO WIMMERS FROM HUBBARD RE PERKINS PAY			
P01079	LETTER 5/13/98 TO PERKINS FROM CROSS RE MILLCREST SOCCER FIELD			
P01080	LETTER 5/20/98 TO CROSS FROM HUBBARD RE COOK'S CDL			

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P01081	LETTER 5/21/98 TO LACINAK FROM CROSS RE GRIEVANCE 4688			
P01082	LETTER 4/21/98 TO LACINAK FROM CROSS RE GRIEVANCE 12345/12350			
P01083	LETTER 4/22/98 TO OSTERDAY FROM CROSS RE JOB AS LEADMAN			
P01084	LETTER 6/18/98 TO SMITH FROM CROSS RE SUSPENSION			
P01085	LETTER 8/20/98 TO CROSS FROM JONES NOT RESIGNING, HOSPITALIZED			
P01086	LETTER 8/20/98 TO ERWIN FROM JONES RE UNION REPRESENTATION			
P01087	LETTER 8/25/98 TO CROSS FROM JONES ENCL APPEAL AND REQUEST			
P01088				
P01089	PETITION ASKING FOR COOK TO BE REMOVED AS UNION STEWARD			
P01090	DAILY LOG - STREET DEPARTMENT - 3/26/98			
P01091	DAILY LOG - STREET DEPARTMENT - 3/30/98			
P01092	DAILY LOG - STREET DEPARTMENT - 4/3/98			
P01093	DAILY LOG - STREET DEPARTMENT - 4/3/98			

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P01094	DAILY LOG - STREET DEPARTMENT - 4/9/98			
P01095	DAILY LOG - STREET DEPARTMENT - 3/26/98 (SAME AS 2036)			
P01096	ROGER PERKINS' CHECK FOR 3 DAYS JURY SERVICE \$22.50			
P01097	ROGER PERKINS' CHECK FOR 2 DAYS JURY SERVICE \$15.00			
P01098	MEDICAL NOTE FROM GHA DATED 3/26/98 RE ROGER PERKINS			
P01099				
P01100	FEE STATEMENT OF GEORGE PARSONS, PH.D			
P01101				
P01102	VIDEOTAPE OF CROSS AND HUBBARD AT NORWOOD MOOSE			
P01103	AUDIOTAPES OF CONVERSATIONS BETWEEN NORWOOD PUBLIC WORKS EMPLOYEES AND PERKINS, COOK, ERWIN AND JONES			
P01104	PERSONNEL FILE OF CLINT ZIMMERMAN PRODUCED BY THE CITY OF NORWOOD			
P01105	MEDICAL RECORDS OF DR. DAVID HELM			
P01106	PAY RECORDS FOR DENNIS COOK FOR 12/21/97 THRU 1/3/98			
P01107	CROSS LETTER TO KENNEDY DATED 12/8/98			

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P01108	CROSS LETTER TO KENNEDY DATED 1/12/98			
P01109	COOK LETTER TO AFSCME CARE PLAN DATED 10/30/99			
P01110	WALL LETTER TO KELLY DATED 11/9/99			
P01111	CROSS LETTER TO WIMMERS DATED 8/9/99			
P01112	CROWLEY LETTER TO HAMILTON COUNTY FOOD STAMP PROGRAM DATED 4/7/89			
P01113	MILLER LETTER TO FORD DATED 5/1/96			
P01114	COOK SETTLEMENT AGREEMENT DATED 7/12/96			
P01115	PERS LETTER TO MOLONY DATED 10/29/99			
P01116	WALL LETTER TO KELLY DATED 3/7/00			
P01117	WALL LETTER TO KENNEDY DATED 3/2/00			
P01118	SERB SETTLEMENT AGREEMENT TO COOK'S ULPS DATED MAY 1998			
P01119	HUBBARD LETTER TO COOK DATED 11/19/98			
P01120	HUBBARD LETTER TO COOK DATED 7/6/98			
P01121	HUBBARD LETTER TO COOK DATED 7/22/98			
P01122	MEDICAL REPORT FOR DENNIS COOK DATED 11/21/97			
P01123	MEDICAL REPORT OF DR. MIDDAUGH DATED 2/10/00			
P01124	COOK BWC CLAIM INFORMATION REPORT DATED 6/24/99			

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P01125	INDUSTRIAL COMMISSION ORDER DATED 12/17/99			
P01126	LISTING OF CITY OF NORWOOD EMPLOYEES			
P01127	ANNUAL REPORTS OF NORWOOD LAW DIRECTOR			
P01128	MEDICAL EXPENSES OF DENNIS COOK			